

Exhibit 15

IN THE UNITED STATES COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION MDL NO. 2804  
OPIATE LITIGATION

Case no.  
17-mdl-284  
Judge Dan Polster

This document relates to:  
The County of Summit, Ohio, et al.,  
V.  
Purdue Pharma L.P., et al.,  
Case No. 1:18-OP-45090 (N.D. Ohio)

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Continued deposition of
PATRICK LEONARD, VOLUME II
PORTIONS OF THE TRANSCRIPT ARE DESIGNATED

CONFIDENTIAL

March 27, 2019

11:03 a.m.

Taken at:
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TRANSCRIPT INDEX

APPEARANCES:.....	111
INDEX OF EXHIBITS	115
EXAMINATION OF PATRICK LEONARD	
By Mr. Roman.....	117
By Mr. Winkelman.....	176
By Mr. Moylan.....	245
By Mr. Goldstein.....	290
By Mr. Moylan.....	342
REPORTER'S CERTIFICATE.....	346
EXHIBIT CUSTODY	
EXHIBITS RETAINED BY COURT REPORTER.	

1 annual basis how much the City of Akron or the
2 Akron Police Department receives pursuant to
3 this asset forfeiture sharing agreements?

4 A. No, I do not.

5 Q. Do you know where these DAG forms
6 are maintained?

7 A. No, sir, I do not.

8 Q. Do you personally maintain copies
9 of the DAG forms that you completed?

10 A. I do not.

11 Q. Where do you send them?

12 A. To one of the administrative staff
13 at the Cleveland Drug Enforcement
14 Administration office to be processed.

15 Q. Do you know who in particular?

16 A. Ashley -- for the life of me, I
17 can't think of her last name right now --
18 Williams.

19 Q. Do you know what Ms. Williams does
20 with them?

21 A. No, sir, I don't.

22 Q. Now, the last time we talked, you
23 testified that there was no opioid crisis in
24 Akron before 2012; do you remember that
25 testimony?

1 A. Yes, sir.

2 Q. And is that still your testimony?

3 MR. LEDLIE: Object to the form.
4 Misstates his testimony.

5 A. Yes, sir, I still believe that the
6 epidemic did not hit prior to 2012.

7 Q. Is it your view that there is now
8 an opioid crisis or epidemic in Akron?

9 A. Yes, sir, there is.

10 Q. How to you describe that crisis or
11 epidemic?

12 A. An overwhelming medical problem in
13 the opioids in our geographical area of
14 Northeastern Ohio.

15 Q. What are the elements of that
16 overwhelming medical problem?

17 A. The amount of time and money spent
18 by the fire department, the police department,
19 the emergency rooms, the coroner's office
20 investigating and following up on overdoses and
21 overdose deaths within our region.

22 Q. And you believe that this epidemic
23 or crisis -- do you prefer one of those two
24 terms?

25 A. It doesn't matter to me.

1 Q. Okay. You believe this epidemic or
2 crisis drug began sometimes between 2012 and
3 2019, correct?

4 A. The crisis, I do have an opinion.
5 The crisis has been ongoing throughout the
6 2000s. It continued to evolve. I don't
7 believe it turned into an epidemic until after
8 2012, but there has been a continual opioid
9 crisis in the geographical area of Summit and
10 Northeastern Ohio.

11 Q. When do you believe it became an
12 epidemic in the Akron area?

13 A. I think that's one of those
14 questions that, based on my training,
15 experience in the field, and doing my job, that
16 those are information I've learned as a TFO and
17 an Akron police officer.

18 I have a hard time disseminating
19 what I'm authorized to say legally.

20 MR. BENNETT: So I'll remind the
21 witness that he is not authorized to give
22 personal opinions regarding nonpublic facts or
23 information you acquired as part of the
24 performance of your task force officer duties.
25 Information you learned outside of the cases

1 you investigated, as a TFO, then you may
2 answer.

3 A. And therein lies the problem. I
4 believe that most of what I learned as a TFO
5 would give me the idea of what years that
6 epidemic started. So unfortunately, I'm not
7 authorized to answer that.

8 Q. Let me ask a different question.
9 What changed, what was it that was not an
10 epidemic before and that became an epidemic,
11 what was the difference, was it just a matter
12 of magnitude, was there an event?

13 A. I don't think there was one
14 specific event. I think it was a continued
15 growth of the crisis that turned into an
16 epidemic, whether it is sheer volume of
17 victims, of individuals, that overwhelmed all
18 the resources we had in the area.

19 Q. And your view is that sometime
20 between 2012 and 2019, the sheer volume took
21 an -- increased, correct?

22 MR. LEDLIE: Object to the form.

23 A. Yes, I believe that's a fair
24 statement.

25 Q. Now, originally, you said you